

IN THE DRAWINGS

Applicants propose to insert the caption "PRIOR ART" into Fig. 1 of the drawings in accordance with the accompanying ANNOTATED SHEET SHOWING CHANGES.

Enclosed herewith is a REPLACEMENT SHEET in which the above change has been incorporated.

REMARKS

The specification has been amended in various places to provide support for terminology now being used in the claims.

The claims have been amended to more clearly define the invention as disclosed in the written description. In particular, the claims have been amended for clarity.

The Examiner has rejected claims 1-4 under 35 U.S.C. 101 as not falling within one of the four statutory categories of invention. Claim 1, as amended, now ties the steps of the method to another statutory category, to wit, apparatus. Therefore, Applicants believe that claims 1-4 are now statutory.

The Examiner has rejected claim 8 under 35 U.S.C. 101 in that the claimed invention is directed to non-statutory subject matter. Claim 8, as amended, now claims a computer-readable medium having a computer program stored thereon.... Applicants submit that this amendment of claim 8 is supported in the specification as filed on page 4, lines 13-28, in that it is inherent that a computer program is stored on/in a computer-readable medium (e.g., the computer memory) in order to be operated on by the computer.

The Examiner has rejected claims 1-8 under 35 U.S.C. 103(a) as being unpatentable over PRIOR ART (Fig. 1) in view of the publication "Computer Graphics, Principles and Practices" to Foley et al.

Applicants' attorney would like to thank the Examiner for the copy of the Foley et al. reference faxed to Applicant.

As described in the specification on page 1, lines 25-28, "Linear scaling operations on a three-dimensional model representing a three-dimensional scene are well known. Scaling of depth information is in principle performed by means of a linear adaptation of the depth information related to the depth range of the output space." Applicants submit that PRIOR ART (Fig. 1) is an example of such linear scaling.

The Foley et al. publication, "Computer Graphics Principles and Practice", discloses, in Chapter 6, "The extra complexity of 3D viewing is caused in part by the added dimension and in part by the fact that display devices are only 2D...The solution to the mismatch between 3D objects and 2D displays is accomplished by introducing projections, which transform 3D objects onto a 2D projection plane." (page 229).

The Examiner has indicated that while the PRIOR ART does not teach "the second scale factor which is larger than the first scale factor",:

"However, such change of scale factor, based on the distance to the view point, is well known in the art, called perspective projection (Foley, Foley, equation 6.2, page 254; "the division by  $z$  causes the perspective projection of more distant objects to be smaller than that of closer objects"). Thus, it would have been obvious in view of the teaching of Foley to provide a perspective projection to configure Prior Art's method as claimed because the perspective projections performing different scale factors on the surfaces of an objects based on their depths yields a realistic representation of objects in 3D space."

PRIOR ART discloses a method that aims to preserve a depth impression when scaling a three dimensional model. However it does

so in a manner that may result in a depth profile that is rather different from the actual depth. Thus the goal is to preserve the depth impression of a three dimensional model in a manner does not create such differences.

The present invention improves on the prior art in that it effectively adapts the input model by re-shaping of the input model in a manner that better respects the geometry present in the three dimensional input model.

Applicants submit that the skilled person attempting to substantially preserve the depth impression when scaling a three dimensional model according to PRIOR ART would not consider Foley et al. as a possible finding place for such an improvement as the algorithm in fact results in a flat 2D projection of a three dimensional model. This is completely opposite of what the skilled person would like to accomplish. Therefore, the skilled person would not consider Foley et al. as a possible finding place for such a solution.

However, even if the skilled person were to attempt to combine Foley et al. with PRIOR ART, he would not come to the present invention. PRIOR ART teaches the skilled person that a three dimensional model can be scaled into a further three dimensional model. Foley et al. teaches the skilled person that a three dimensional model can be projected to a flat 2D projection. When the skilled person would combine the teachings of PRIOR ART and Foley et al., he would only be able to do so, by first scaling according to PRIOR ART followed by scaling according to Foley et

al. If the skilled person would do so, he would in fact come to a solution that is very different from the present invention.

First applying Foley et al. in turn would result in a flat 2D projection, rendering the application of PRIOR ART on the output useless.

Applicants respectfully submit that Foley et al. does not provide the skilled person with a teaching as to how a three dimensional model should be scaled to a three dimensional model. In fact Foley et al. does not provide any indication to the skilled person as to how to preserve the three dimensional impression of a three dimensional model.

In view of the above, Applicants believe that the subject invention, as claimed, is not rendered obvious by the prior art, either individually or collectively, and as such, is patentable thereover.

Applicants believe that this application, containing claims 1-8, is now in condition for allowance and such action is respectfully requested.

Respectfully submitted,

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